

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
(PITTSBURGH)**

IN RE:

**Jamie Lynn Haugh  
Debtor**

**Wilmington Savings Fund Society, FSB, as  
trustee of Stanwich Mortgage Loan Trust  
M, through its servicer, Carrington  
Mortgage Servicing,  
Movant**

**v.**

**Jamie Lynn Haugh  
Respondent**

CHAPTER 13

CASE NO.: 22-21034-CMB

**OBJECTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB, AS TRUSTEE OF  
STANWICH MORTGAGE LOAN TRUST M TO THE CONFIRMATION OF THE  
DEBTOR'S CHAPTER 13 PLAN**

Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust M, through its servicer, Carrington Mortgage Servicing ("Secured Creditor"), by its attorneys Hill Wallack LLP, hereby objects to the confirmation of the Debtor's Chapter 13 Plan as follows:

1. Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust M is the holder of a Note and Mortgage on real property owned by Jamie Lynn Haugh ("Debtor") at 615 Paulowina Drive, Leechburg, PA 15656 (the "Property").
2. On or about May 31, 2022, Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court.
3. As of Petition date, Secured Creditor is the holder of a secured claim with pre-petition arrears in the amount of approximately \$739.33, which amount will be more specifically stated in a Proof of Claim which will be filed prior to the bar date.

4. The Debtor does not include the Secured Creditor in her Chapter 13 Plan and provides no payment for the pre-petition arrearage on the Mortgage.

5. The Plan as proposed does not provide for Secured Creditor's claim, and therefore, the Plan is not confirmable as the Debtor's options are to either provide for payment pursuant to 11 U.S.C. §1325(a)(5)(B)(ii) or surrender pursuant to 11 U.S.C. §1325(a)(5)(C). The Plan does neither, and therefore, the Plan does not satisfy the confirmation requirement of 11 U.S.C. §1325(a)(1).

6. If the Plan is confirmed, the Secured Creditor may suffer irreparable injury, loss, and damage.

WHEREFORE, Secured Creditor respectfully requests that confirmation of the Debtor's Chapter 13 Plan be denied.

Respectfully submitted,

By: /s/ Elizabeth K. Holdren, Esquire  
Elizabeth K. Holdren, Esq., Atty ID 78948  
Hill Wallack LLP  
777 Township Line Road, Suite 250  
Yardley, PA 19067  
215-579-7700  
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**ORDER**

**AND NOW**, this            day of            , 2022, upon consideration of the Debtor's Chapter 13 Plan, and the objection of Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust M, through its servicer, Carrington Mortgage Servicing and after hearing, it is hereby:

**ORDERED** that confirmation of the Debtor's Chapter 13 Plan is denied.

**BY THE COURT:**

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**CARLOTA M. BOHM  
U.S. Bankruptcy Judge**

**UNITED STATES BANKRUPTCY COURT  
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CASE NO.: 22-21034-CMB

**CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF THE  
DEBTOR'S CHAPTER 13 PLAN**

I certify under penalty of perjury that I served or caused to be served the above-captioned pleading, Objection to Confirmation of the Debtor's Chapter 13 Plan, on the parties below via First-Class Mail and Electronic Notification on July 1, 2022.

**Jamie Lynn Haugh**  
934 Talon Court  
Leechburg, PA 15656  
Debtor  
**Via Regular Mail**

**David A Colecchia, Esq.**  
324 South Maple Avenue  
Greensburg, PA 15601-3219  
Debtor's Counsel  
**Via ECF**

**Ronda J. Winnecour**  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
Chapter 13 Trustee  
**Via ECF**

**United States Trustee**  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222  
Counsel to the UST  
**Via ECF**

Respectfully submitted,

By: /s/Elizabeth K. Holdren, Esquire  
Elizabeth K. Holdren, Esq., Atty ID 78948  
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